

Kevin Lucas  
October 27, 2020

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- KEVIN LUCAS -

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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ULKU ROWE,

Plaintiff,

Case No.  
19 Civ. 08655(LGS)(GWG)

v.

GOOGLE LLC

Defendant.

----- X

DATE: October 27, 2020

TIME: 11:35 A.M.

VIDEOTAPED VIDEOCONFERENCE DEPOSITION  
OF KEVIN LUCAS, held via Zoom, pursuant to Notice,  
before Hope Menaker, a Shorthand Reporter and  
Notary Public of the State of New York.

1 - KEVIN LUCAS -

2 motion for us than -- than anything.

3 Q. And is it your testimony that they  
4 also don't work with engineering at all?

5 MR. GAGE: Objection.

6 A. It is -- how do I -- yes, basically  
7 they might interact occasionally with engineering  
8 or product management, but they by -- by saying  
9 "work with," I wouldn't characterize it as that  
10 because I interpret that as almost like close  
11 partnership and collaboration on something and  
12 that's -- that's not so much the role.

13 Q. What -- again, focusing on technical  
14 solution consultants, the director level in  
15 Cloud -- I mean in OCTO, I'm sorry --

16 A. In OCTO.

17 Q. -- what's the difference between the  
18 responsibilities of that role and the  
19 responsibilities of a director in software  
20 engineering?

21 A. It's -- it's a similar response to PM  
22 in that they're -- they're more dissimilar than  
23 they are alike.

24 Software engineering leaders, a  
25 portion of their role is actually building. So

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2 coding the products that -- or writing the code  
3 that builds our products and services. So  
4 literally writing in computer language to build  
5 things.

6 Whereas the TSC directors in OCTO do  
7 not check in code to Google Free, which is -- is  
8 our platform by which we launch our -- our  
9 products. So, in fact, I don't think they  
10 have -- I don't think TSCs in OCTO have access to  
11 write code in Google Free.

12 Q. Are directors writing code or are  
13 they supervising people who are writing code?

14 A. There's a component of -- of writing  
15 a code and -- and approving a code before it's  
16 pushed into production of -- of directors, yes.

17 Q. Do you know what technical  
18 requirements a technical solutions consultant is  
19 required to have?

20 MR. GAGE: Objection. I'm sorry, I  
21 didn't hear the question. You broke up.

22 Q. Do you know what technical  
23 requirements a technical solutions consultant is  
24 required to have? What are their technical  
25 qualifications --

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2 MR. GAGE: Objection.

3 Q. -- again, focusing on directors in  
4 OCTO?

5 A. I would probably characterize it as  
6 the ability to understand concepts versus actually  
7 write code. So technical solutions, the -- the  
8 job family technical solutions consultant, is kind  
9 of more generally focused on understanding  
10 technical concepts and how that applies to  
11 implementation on the customer's side of the  
12 house.

13 Whereas the software engineering is  
14 kind of understanding the guts and everything  
15 under the hood and actually being able to build  
16 all of it from scratch.

17 MS. GREENE: So --

18 MR. GAGE: Cara, yeah, can we pause  
19 for a second. I -- I had a screen -- Kevin's  
20 screen froze and I couldn't hear him.

21 So, Hope, can you just tell us what's  
22 the last thing you heard and maybe just go to  
23 the question and the answer so that we all  
24 know the context of where we are on the  
25 record at least.

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2 track, though not necessarily the individual  
3 contributors. There is a manager track.

4 So, broadly speaking, day-to-day  
5 responsibilities can be everything from probably  
6 the bulk of -- a reasonable amount of their time  
7 being spent on coding and/or approving codes  
8 that's have been pushed into production that  
9 ultimately make their products and services  
10 available.

11 I would say there's a bulk of it  
12 that -- or maybe a smaller portion that's around  
13 leading the team if you're on the people manager  
14 track. There's a reasonable part of it that is  
15 around contributing to what we call PRD, Product  
16 Requirement Documents, that these are essentially  
17 documents that define how -- like what we're  
18 trying to build and how we're actually gonna kind  
19 of build it; and there's probably a -- a small  
20 percent of time that they are kind of doing like  
21 typical business stuff, just like end meetings and  
22 corroborating and things like that.

23 Those are probably the broad buckets.

24 Q. And in what ways does the day-to-day  
25 responsibilities of Level 9 software engineers

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2 look different?

3 A. Day-to-day responsibilities for  
4 software engineering don't change a whole lot from  
5 Level 8s to 9. It is similar to our conversation  
6 we previously had, whereby either the scope and  
7 visibility and impact of their role shifts in some  
8 ways.

9 So they are probably more aligned to  
10 a higher priority product, perhaps a more kind of  
11 innovative product if you will. They may start  
12 leading a larger organization whereby more,  
13 quote/unquote, products roll up to them.

14 So it's more about kind of scope and  
15 product prior -- priority than shifting day-to-day  
16 responsibilities from an L 8 to L 9 software  
17 engineer.

18 Q. What are the skills necessary for an  
19 L 8 software engineer?

20 A. Coding ability is probably the -- the  
21 fore -- the forerunner there for which they still  
22 have to go through coding interviews when code is  
23 submitted in their interview packets, et cetera,  
24 so that is probably the largest one.

25 There's going to be elements,

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2 software engineering, but product management is  
3 still a technical role because it sits within the  
4 broader umbrella of Eng PM. So the primary  
5 partner to the PMs, to product managers, are the  
6 SWEs, are software engineers.

7 Q. And what are the skills that are  
8 necessary for the product management Level 8 role?

9 A. Yeah. For Level 8 PM directors,  
10 you're probably looking at someone who has  
11 built and/or scaled products to reasonable size  
12 and/or significant size. So kind of your product  
13 management pedigree is -- is kind of your whole  
14 profile.

15 I would say the -- the strategic  
16 thinking aspect of it is -- is critically  
17 important for product managers, because their  
18 having to look into the future and predict and/or  
19 anticipate what customers or users are going to  
20 want or need.

21 There is a monetization element of  
22 it, at least for -- for our business, whereby  
23 you're thinking from a commercial acumen  
24 perspective how do you actually drive revenue  
25 through these products and how you think about

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2 monetizing them.

3 Those are probably the three broad  
4 buckets that are -- are more unique to the product  
5 manager role, in addition to the other things I  
6 mentioned before about kind of like, you know,  
7 agility and ambiguity.

8 Q. And what skills are less of -- what  
9 additional skills are necessary at the L 9 level?

10 A. I would say it's probably largely  
11 around portfolio complexity, and what I mean by  
12 that is for L 8 product managers it's not uncommon  
13 that they manage a single product and/or a small,  
14 small group of products.

15 But once you move them to Level 9  
16 product leaders, you're really looking more so  
17 from a portfolio perspective whereby they're  
18 probably going to have, you know, half a dozen  
19 different products that roll up to them which then  
20 means you're having to manage the competing  
21 priorities and complexities across your portfolio  
22 a little bit more.

23 So there is a -- a systems akin  
24 aspect of it that is probably a step change from  
25 L 8 to 9.